



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

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**SENSITIVE**

**MEMORANDUM**

April 26, 2018

TO: The Commission

THROUGH: Alec Palmer *AP*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Krista J. Roche *KJR*  
Director, ADR Office

SUBJECT: ADR 855 Utah Republican Party and Abram Young,  
Treasurer, Recommendation to Approve Negotiated  
Settlement

RESOLUTION TERMS: Amend relevant 2015-2016 reports to address any  
inadequate responses and nonresponses to requests for  
additional information from RAD; certify that a  
representative of the Committee participated in an FEC  
conference, webinar, or other program developed in  
consultation with the FEC's Information Division; and pay  
a civil penalty of \$7,800.

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 855 (AD 17-28). The ADR Office received this referral on November 8, 2017.

**SUMMARY:** The Reports Analysis Division referred and the Audit Division transferred Respondents for a series of reporting errors and other FECA violations during the 2015-2016 election cycle. A political committee may be referred if, after an internal review of reports filed by the committee, the Commission determines the reports do not meet the threshold requirements for substantial compliance with the FECA. The Committee's reporting errors included, among other items: excessive, prohibited and other impermissible contributions and transfers; mathematical discrepancies; failure to provide supporting schedules; and allocated federal and non-federal activity.

Recommendation to Approve  
Settlement Agreement  
ADR 855 (AD 17-28)  
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Respondents contend that there were reporting challenges during the 2016 election cycle. Specifically, the Committee's new leadership contends they are committed to timely and accurate reporting under the FECA and have implemented new compliance procedures. In addition, the Committee retained an experienced compliance specialist to handle its reporting and perform reconciliations.

**RECOMMENDATIONS:**

1. Approve the attached negotiated settlement of Utah Republican Party and Abram Young, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.